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Counsel for Plaintiffs

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 JAMES RUHLMANN and ERIC SAMBOLD,

10 Plaintiffs,

11 vs.

12 GLENN RUDOLFSKY, individually, KIM
13 RUDOLFSKY, individually, and HOUSE OF
14 DREAMS KAUAI, INC., a New York domestic
15 corporation,

16 Defendants.

17 *Et al.*

Case No.: 2:14-cv-00879-RFB-NJK

**STIPULATION AND ORDER TO
EXTEND STAY OF PROCEEDINGS**

18 As outlined in the Joint Status Report filed contemporaneously herewith (Doc 253), the parties
19 hereby stipulate and agree to stay all deadlines and filing requirements until March 1, 2018, pending
20 the parties' efforts to effectuate a global resolution of this matter.

21 The parties submit this stipulation in accordance with their July 31, 2017 global agreement to
22 resolve this matter and their January 4, 2018 agreement on the completion of certain terms required
23 to effectuate the July 31, 2017 agreement. The parties' agreements are subject to certain terms and
24 documentation, including confidentiality except as necessary for Defendants' financing and further
25 court proceedings. The parties agreed they would not dismiss their claims pending completion of the
26 terms of the resolution in the event of non-compliance, which they agree will occur by February 15,
27 2018. These terms include Defendants' obtaining financing with a third party; the execution of further
28 documentation as may be required by the Court or the settlement agreement and Plaintiffs'

1 cooperation in providing information requested by Defendants' lender; Plaintiffs' execution of a
2 Request for Verification of Mortgage form; the parties' agreement on a final draft of a settlement and
3 release agreement showing that the settlement fully satisfies the mortgage recorded by Eric Sambold
4 Trust; Defendants' dismissal of their third party complaint (Doc 230) and withdrawal of their motions
5 to lift stay and enforce settlement agreement and for attorney's fees (Docs 245 and 246); a lump sum
6 payment by Defendants; and, the execution of any documentation required to request and effectuate
7 a stay of these proceedings pending documentation of the terms required.

8 Consequently, the parties respectfully request this Court order a stay of all pending deadlines
9 and filings in this matter until March 1, 2018.

10 DATED this 5th day of January, 2018.

11
12 /s/ Hannah C. Irsfeld
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12 /s/ Valerie Del Grosso
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19 **ORDER**

20 IT IS SO ORDERED on this 25th day of January 2018.

21
22 

23 RICHARD F. BOULWARE, II
24 United States District Judge

25 Respectfully submitted by:

26 /s/ Hannah C. Irsfeld
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